



February 12, 2001

Office of Pollution Prevention and Toxics (OPPT)
Attention: Chemical Right to Know
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20046

Re: Request for "No Longer HPV" for 1691-99-2, 24448-09-7, 307-35-7, 40630-63-5, and 29590-42-9

Dear Sir/Madam:

3M is submitting this letter to request that the following chemicals be classified as "No Longer HPV":

1691-99-2	N-ethyl, perfluorooctane sulfonamidoethanol (N-EtFOSE)
24448-09-7	N-methyl, perfluorooctane sulfonamidoethanol (N-MeFOSE)
307-35-7	Perfluoro 1-octane sulfonyl fluoride (POSF)
40630-63-5	1-octane sulfonyl fluoride (OSF)
29590-42-9	1-octane sulfonyl chloride (OSCl)

This request is in accordance with EPA's draft guidance Procedures for Removing Chemicals that are No Longer HPV and are not likely to Become HPV Again from the HPV List [draft guidance document located at <http://www.epa.gov/opptintr/chemrtk>].

3M previously committed to sponsor the subject chemicals under the HPV Challenge Program. However, these chemicals are all subject to 3M's May 16, 2000 announcement to phase-out manufacture of products based on perfluorooctanyl chemistry. In that announcement, 3M indicated that worldwide production of these materials would be substantially discontinued by the end of 2000. In meeting this phase-out plan, 3M production will be below HPV volume criteria. 3M will discontinue production of these materials globally by the end of 2002. 3M's phase-out decision was based on its commitment to responsible environmental management and sound business principles. 3M's detailed global phase-out plan was submitted to the EPA on July 7, 2000.

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Office of Pollution Prevention and Toxics (OPPT)

Please contact me if you have any questions concerning this request. Thank you for your consideration.

Sincerely,

Michael A. Santoro, Director
Environmental, Health, Safety & Regulatory Affairs
Specialty Material Markets Group
3M Center Bldg. 236-1B-10
St. Paul, MN 55144
651/733-6374

c: C. Auer – U.S. EPA



October 9, 2001

Office of Pollution Prevention and Toxics (OPPT)
Attention: Ms. Barbara Leczynski
Chemical Right to Know
Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20046

Re: Request for "No Longer HPV", correction to February 12, 2001 letter

Dear Ms. Leczynski,

On February 12, 2001, 3M requested that five materials be classified as "No Longer HPV". 3M included the correct name for 1-octane sulfonyl chloride (OSCI) but included the wrong CAS number. The correct CAS number is 7795-95-1. This letter is to correct only the CAS number; the justification and references remain accurate. Please contact me if you have any questions.

Sincerely,

Michael A. Santoro, Director
Environmental, Health, Safety & Regulatory Affairs
Specialty Material Markets Group
3M Center Bldg. 236-1B-10
St. Paul, MN 55144
651/733-6374

c: C. Auer -- U.S. EPA

1999-2000 HPV COMMITMENT PROGRESS REPORT FOR: [3M]

Data from EPA's HPV web site, and/or the ICCA Tracking System as of: [April 13, 2001].

I. US HPV Challenge, Unmet Commitments -- Individual Chemicals

CAS#	Chemical Name	Start Year
7795-95-1	1-Octanesulfonyl chloride	2000
40630-63-5	1-Octanesulfonyl fluoride	2000
307-35-7	1-Octanesulfonyl fluoride 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-	2000
307-35-8	heptadecafluoro-	
2448-09-7	1 Octanesulfonamide 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8-	2000
	heptadecafluoro-N-(2-hydroxyethyl)- n-methyl	
86508-42-1	Perfluoro compounds, C5-18	2000
311-89-7	Tributylamine, heptacosafuoro	2000
1691-99-2	1 Octanesulfonamide, N-ethyl- 1,1,2,2,3,3,4,4,5,5,6,6,7,7,8,8,8,-	1999
	heptadecafluoro-N-(2-hydroxyethyl)	

II. US HPV Challenge, Unmet Commitments -- As Part of a Panel/Consortium

Consortia Name	CAS# (s)	Chemical Name(s)	Start Year
<i>None</i>			

III. ICCA HPV Initiative Commitments Made For This Time Period

Consortia Name	CAS# (s)	Chemical Name(s)	Start Year
<i>None</i>			

IV. US HPV Commitments Fulfilled (Test Plan Filed)

Chemical/Consortia Name	CAS#	Start Year
<i>None</i>		